



SDMS DocID

2075235

Harry R. Steinmetz (3HS62)
United States Environmental Protection Agency Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Safety Light Corporation Site
Bloomsburg, Pennsylvania

Dear Sir,

Oregon Health & Science University (OHSU) received your information request on July 27, 2005 regarding Safety Light Corporation (Safety Light) and its subsidiaries, predecessors and affiliated companies. Because of the nature of the inquiry, the President's office delegated this matter to the Environmental Health and Radiation Safety Department (EH&RS).

This investigation centers around a document that was attached to your letter, which shows the following entries on the ledger:

"7/27/62 Cleaning and leak test of chromatography cell
BL059598 c.o. M-36. Containing 20 mc Sr-90 source. Results: 30 cpm net.
USRC # 40841"

"10/31/62 Measurement of Source
BL059598R USRC 40841 for content
N/C"

There are no entries on this ledger document showing receipt from, disposal for or return shipment to OHSU. Our investigation centered on locating documents or evidence relating to this document. This included discussions with our purchasing department, legal department and logistics department, who manage all document archiving to a third-party vendor, Iron Mountain, Inc. The questions will be answered in the order presented in your letter. The responses are as follows:

1. To the best of our knowledge, we have been unable to determine the business relationship that existed between OHSU and Safety Light. There is no known documentation proving that a relationship exists or existed in the past.
2. We have been unable to locate any records of ever transporting or brokering hazardous or radioactive waste or any other wastes with or through Safety Light or their subsidiaries, predecessors or affiliated companies.

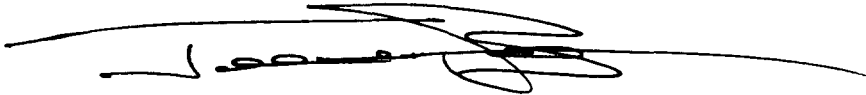
3. N/A
4. We have been unable to locate any records showing that OHSU generated radioactive wastes or other wastes that were disposed or reclaimed by Safety Light or their subsidiaries, predecessors or affiliated companies.
5. N/A
6. We have not been able to determine and have no reason to believe that anyone affiliated with OHSU, previously or currently, would be able to provide additional information related to this information request.
7. We know of no documents that are not in our possession that could provide additional information related to this Information Request.
8. When the Safety Light document was written, the regulatory environment concerning radioactive materials was much different than it is today. The State of Oregon was not yet an agreement state, which happened in 1966. Because of this, the Atomic Energy Commission (AEC), which was the precursor to the Nuclear Regulatory Commission (NRC), was the regulating body. In 1966 Oregon Radiation Protection Services (ORPS) became the regulatory agency for radioactive materials use in the State of Oregon. ORPS was contacted to establish this fact. It is possible that the AEC might have licensing information related to OHSU, but it is very doubtful that they would have any specifically related to this issue. There is no reason to believe that any other party(ies) would have any further information related to the investigation of Safety Light or generation of, transportation to, or release of contamination at the site, especially pertaining to OHSU and its past or present employees.
9. Because of the time that has elapsed since the date of the document attached to the Information Request, if any records existed, these records are not currently available.
 - a. No state regulation currently applies to the retention of the records at issue. However, OHSU generally looks to the Oregon Administrative Rules records retention policy for guidance. See Oregon Administrative Rules Chapter 333, Division 120 Section 670 (333-120-670) for radioactive waste disposal records. For a copy of this regulation see attachment 1.

The document retention policy during the period of the document that is attached to your Information Request was not available.

- b. If any documents existed relating to the Information Request, it is unknown how they were destroyed and when because of the amount of time that has elapsed since then.
- c. It is unknown what type of information they might have contained.
- d. We have not been able to determine and have no reason to believe that anyone affiliated with OHSU, previously or currently, would have produced or been responsible for the documents.

In summary, the EH&RS department did a search for any documents or records related to the Safety Light document and the investigation of Safety Light and their subsidiaries, predecessors or affiliated companies. There is no evidence in OHSU's possession that would substantiate the document, nor is there any evidence that might refute it. OHSU believes that no other persons, parties or institutions related to OHSU would be able to provide additional information or documentation in this matter.

Respectfully,



John W. Burnham, Ph.D.
Director, Environmental Health & Radiation Safety
Oregon Health & Science University
3181 S.W. Sam Jackson Park Rd.
Portland, OR 97239

Cc: Janet Billups, Legal

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be maintained separately from the dose records.

(6) The licensee shall retain each required form or record until the Agency authorizes disposition.

Note: The following information is required on Form Z, Occupational Exposure Record for a Monitoring Period: Name; identification number and type (Social Security Number (SSN), Passport Number (PPN), Canadian Social Insurance Number (CSI), Work Permit Number (WPN), INDEX Identification Number (IND), or Other (OTH)); sex; date of birth; monitoring period; licensee name; license or registration number; is dose is official record or estimate; if dose is routine or planned special exposure; intake, list radionuclide, class, mode, total intake (μCi); external dose(s), DDE (Deep Dose Equivalent in rems), LDE (Lens Dose Equivalent in rems), SDE(WB) (Shallow Dose Equivalent Whole Body in rems), SED(ME) (Shallow Dose Equivalent Maximum Extremity in rems), CEDE (Committed Effective Dose Equivalent in rems), CDE (Committed Dose Equivalent in rems), TEDE (Total Effective Dose Equivalent in rems) and TODE Total Organ Dose Equivalent in rems).

Stat. Auth.: ORS 431.925 - 431.955 & 453.605 - 453.755
Hist.: HD 15-1994, f. & cf. 5-6-94; HD 24-1994, f. & cf. 9-6-94; HD 1-1995, f. & cert. cf. 4-26-95

Records of Dose To Individual Members of the Public

333-120-660 (1) Each licensee shall maintain records sufficient to demonstrate compliance with the dose limit for individual members of the public (OAR 333-120-180).

(2) The licensee shall retain the records required by section (1) of this rule until the Agency terminates each pertinent licensee requiring the record.

Note: The following information is required on Form Z, Occupational Exposure Record for a Monitoring Period: Name; identification number and type of number, such as SSN; sex; date of birth; monitoring period; licensee name; license or registration number; if dose is official record or estimate; if dose is routine or planned special exposure; intakes, list radionuclide, class, mode, and total intake (μCi); external dose(s), DDE, LDE, SDE(WB), SDE(ME), CEDE, CDE, TEDE and TODE; signature of monitored individual and date signed; certifying organization and signature.

Stat. Auth.: ORS 431.925 - 431.955 & 453.605 - 453.755

Hist.: HD 15-1994, f. & cf. 5-6-94; HD 24-1994, f. & cf. 9-6-94; HD 1-1995, f. & cert. cf. 4-26-95

Records of Waste Disposal

333-120-670 (1) Each licensee shall maintain records of the disposal of licensed materials made under Divisions OAR 333-120-510, 333-120-520, 333-120-530, 333-120-540, 10 CFR Part 61, and disposal by burial in soil, including burials authorized before January 28, 1981.

(2) The licensee shall retain the records required by section (1) of this rule until the Agency terminates each pertinent licensee requiring the record.

Stat. Auth.: ORS 431.925 - 431.955 & 453.605 - 453.755

Hist.: HD 15-1994, f. & cert. cf. 5-6-94

Records of Testing Entry Control Devices for Very High Radiation Areas

333-120-680 (1) Each licensee shall maintain records of tests made under OAR 333-120-240(1)(i) on entry control devices for very high radiation areas. These records must include the date, time, and results of each such test of function.

(2) The licensee shall retain the records required by section (1) of this rule for five years or until inspected by the Agency.

Stat. Auth.: ORS 431.925 - 431.955 & 453.605 - 453.755

Hist.: HD 15-1994, f. & cf. 5-6-94; HD 24-1994, f. & cert. cf. 9-6-94

Form of Records

333-120-690 Each record required by this Division must be legible throughout the specified retention period. The record may be the original or a reproduced copy or a microform provided that the copy or microform is authenticated by authorized personnel and that the microform is capable of producing a clear copy throughout the required retention period. The record may also be

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stored in electronic media with the capability for producing legible, accurate, and complete records during the required retention period. Records, such as letters, drawings, and specifications, must include all pertinent information, such as stamps, initials, and signatures. The licensee shall maintain adequate safeguards against tampering with and loss of records.

Stat. Auth.: ORS 431.925 - 431.955 & 453.605 - 453.755

Hist.: HD 15-1994, f. & cf. 5-6-94; HD 24-1994, f. & cert. cf. 9-6-94

Reports

Reports of Theft or Loss of Licensed Material

333-120-700 (1) Telephone reports: Each licensee shall report by telephone to the Agency as follows:

(a) Immediately after its occurrence becomes known to the licensee, any lost, stolen, or missing device or licensed material in an aggregate quantity equal to or greater than 1,000 times the quantity specified in 10 CFR Part 20 Appendix C to 20.1001 to 20.2401 under such circumstances that it appears to the licensee that an exposure could result to persons in unrestricted areas; or

(b) Within 30 days after the occurrence of any lost, stolen, or missing device or licensed radioactive material becomes known to the licensee, all licensed material in a quantity greater than 10 times the quantity specified in 10 CFR Part 20 Appendix C to 20.1001 to 20.2401 that is still missing at this time.

(2) Written Reports: Each licensee required to make a report under section (1) of this rule shall make a written report to the Agency, within 30 days after making the telephone report, setting forth the following information:

(a) A description of the device or licensed material involved, including kind, quantity, and chemical and physical form; and

(b) A description under which the loss occurred;

(c) A statement of probable disposition of the licensed material involved;

(d) Exposures of personnel, circumstances of exposures occurred, total effective dose equivalent in unrestricted areas;

(e) Actions that will be taken, to prevent recurrence and

(f) Procedures or actions that have been, or will be, taken against a recurrence of a device or licensed material.

(g) Subsequent to the report, the licensee shall report any additional substantiated loss or theft within 30 days after the licensee learns of such loss or theft.

(3) The licensee shall file a report with the Agency under this section so that the Agency, who may have received information on radiation are stated in the report, a detachable part of the report.

Stat. Auth.: ORS 431.925 - 453.755

Hist.: HD 15-1994, f. & cert. cf. 5-6-94

Notification of Incidents

333-120-710 (1) Notwithstanding any other provisions to the contrary, the licensee shall immediately report to the Agency a device or licensed material possessed by the licensee that has caused or threatens to cause the following conditions:

(a) An individual receiving a total effective dose equivalent of 25 rem (0.25 Sv) or more;

(b) An eye dose equivalent of 0.75 Sv or more; or

(c) A shallow-dose equivalent to skin or extremities of 150 rem or more; or



OHSU

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